CLI Subgroup Activities

The CLI was envisioned from the beginning as a partnership and a process involving teamwork among many Stakeholders. Phase II of the CLI had several different focuses, each of which required the expertise of different EPA management and Stakeholders. Subgroups concentrated on each of the following areas:

- # research on consumer knowledge, attitudes, and behaviors related to labeling information;
- # standardized environmental information;
- # storage and disposal information on products; and
- # consumer education related to label awareness and use.

Members of each subgroup consisted of CLI Partners, Task Force members, EPA, other federal agency personnel, and other interested CLI Stakeholders. Each subgroup made efforts to keep other CLI groups informed of all significant activities and findings. Subgroup members were responsible for collaborating with others in their subgroup and conveying information from the subgroup meetings to people in their own organizations. Subgroups provided information to the group developing and implementing the quantitative and qualitative research. Input from subgroups was instrumental in survey development, analysis of the survey results, and formulation of the Phase II recommendations. In many ways, the work of each subgroup affected that of the others, and the CLI has been a dynamic process of teamwork among the many Stakeholders.

Quantitative and Qualitative Research Core Group

A group of 22 CLI Stakeholders volunteered their time and expertise to coordinate the quantitative and qualitative research of Phase II. Members included key people from the EPA, market researchers from Amway Corporation, Bayer Corporation, the Chemical Specialties Manufacturers Association (CSMA), Procter and Gamble, Reckitt and Colman, The Clorox Company, Monsanto Lawn and Garden, S.C. Johnson and Son, Inc., RISE (Responsible Industries for a Sound Environment), the Consumer Product Safety Commission (CPSC), and the Food and Drug Administration (FDA). Appendix 1-5 lists all the Core Group members who were involved primarily with the quantitative research.

The group met on a weekly basis via conference calls to develop and refine questions for the quantitative survey instruments (telephone and mail survey). The market researchers from the companies were experts in their field and were able to provide input on the types of questions and question formats that would be appropriate for each product category. The group worked together to formulate questions addressing consumer understanding, preference, and satisfaction with current labels. Additional questions were asked regarding specific topic areas, such as ingredient information. (See Chapter 2 for a full description of the quantitative research.)

The Core Group also developed the focus and questions for the qualitative research and helped familiarize The Newman Group, Inc. with the CLI and its goals and objectives. Members of the Core Group observed several of the qualitative focus groups and provided feedback after each group on ways in which the moderator might be better able to convey the ideas being tested in subsequent focus groups. Appendix 1-6 lists all the members of the Qualitative Subgroup.

Finally, after the quantitative and qualitative research was completed, a small subset of the Core Group (consisting of market researchers [one each from Amway Corporation, Bayer Corporation, The Clorox Company, Procter and Gamble, and S.C. Johnson and Son, Inc.] and three EPA Task Force members), continued to meet on a weekly basis to interpret and analyze the survey results. This group studied the data thoroughly, and formulated findings, implications, and conclusions. (See Chapters 2, 3 and 4 for a complete discussion of the findings, implications, and conclusions from the quantitative and qualitative research.)

Standardized Environmental Information on Product Labels Subgroup

A small working group consisting of EPA personnel and industry Partners was formed to address the issue of standardized environmental information on product labels. The group initially met regularly; as the scope of this issue changed, the group also met with the research Core Group. Appendix 1-7 lists all the members of the Standardized Environmental Information Subgroup.

Initially, the group set out to investigate the possibility of developing standardized information on product labels in the form of a facts box of environmental information (analogous to the food nutrition label). Based on input from this working group and the desire of the Agency to advance the development of this concept and frame the debate, consumer research on standardizing environmental information was performed as part of the quantitative research. Part of the quantitative research asked consumers what they felt was the most important information on a label and to identify which types of information they looked for in different situations. The quantitative research found that consumers interviewed did not generally consider environmental information to be one of the more important sections of the product labels. Consumers also said that a standardized format for labels would help them to more easily locate the information that they consider to be important.

The group's focus regarding standardization of information on product labels then shifted. Given what consumers were saying, the group decided that it was most important to test variations of standardized formats on product labels to see whether any of the formats improved consumers' understanding of label information. It was decided that various box and standardized label formats would be tested via the qualitative research. Consumers in the focus groups were asked questions about their preference for specific formats, whether the formats made a difference in their understanding of the information presented, and whether they had a preference for which *information* should be presented in standardized or box formats.

See Chapter 6, section 1 for a more details regarding the standardized format research.

Storage and Disposal Subgroup

The Storage and Disposal Subgroup was formed at the end of Phase I to address some of the key findings from Phase I research on storage and disposal issues. (The complete Storage and Disposal Subgroup is listed in Appendix 1-8.) These Phase I findings included the following:

- # consumers often do not read storage and disposal instructions;
- # consumers frequently attempt to recycle the empty plastic containers that hazardous household products come in, which often violates regulations relating to public health and safety; and
- # EPA standard disposal instructions on labels may conflict with some state or local laws or practices.

In Phase II, the CLI Storage and Disposal Subgroup directed research to obtain a better overview and understanding of current state and local regulations and practices regarding storage and disposal of household hazardous products. The Subgroup also identified problems related to modifying storage and disposal language on labels. An informal survey was made of members of the North American Hazardous Materials Management Association (NAHMMA). Telephone interviews, a literature review, and discussions with and presentations of data by a variety of Stakeholders supplemented the survey results. Input from the storage and disposal groups was also taken into consideration when formulating questions for the qualitative and quantitative research, and in the analysis of the research data.

See Chapter 6, section 2 for a detailed discussion of the Storage and Disposal Subgroup activities.

Consumer Education Subgroup

The ultimate goal of the CLI is to change the behavior of consumers regarding pesticides and household cleaning products, especially to:

- # increase reading and use of labels;
- # decrease the misuse of products;
- # decrease the incidence of accidents involving products; and
- # decrease environmental impacts caused by improper use, storage, and disposal of these products.

Phase I research and the extensive literature search, supported by many Stakeholder comments, found that many consumers do not consistently or thoroughly read labels for these types of products. Changes of label information or design will not be beneficial to consumers unless they read the labels. As part of Phase II, the CLI therefore established a Consumer Education Subgroup, to concentrate on ways to 1) increase consumer awareness of labels; 2) encourage consumers to read labels and use their information thoughtfully, for both their personal safety and as part of their environmental responsibility; and 3) to help people understand the information presented on labels. Appendix 1-9 lists all the members of the Consumer Education Subgroup.

The Consumer Education Subgroup conceptualized, developed, and began implementing a broad-based, long-range consumer education plan intended to help people to read, understand, interpret, and use label information. The Subgroup developed an easily understood message —"Read the Label *FIRST!*"— and began developing a unique, memorable, consumer-friendly logo of the message. The various components of the campaign were designed to work with and reinforce each other. The Subgroup also strategized the goals of the education campaign and support materials, and suggested ways in which to use the materials. The subgroup prepared brochures targeting different audience groups, and designed succinct messages that can be adapted to a variety of educational approaches and materials.

See Chapter 6, section 3 for a detailed discussion of the Consumer Education Campaign.